REMARKS

Claims 1, 3-7, 9-17, 19-25, 27-31, 33-41, 43-51, 53-55 and 57-66 are pending and stand rejected. In response, claims 1, 19, 25, 43, 49, 53, 57-58, 61-62, and 65-66 are amended. Claims 60 and 64 are canceled. Claims 1, 3-7, 9-17, 19-25, 27-31, 33-41, 43-51, 53-55, 57-59, 61-63, and 65-66 are pending upon entry of this amendment.

Response to Rejections Under 35 USC 103(a)

Claims 1, 3-7, 9-14, 16-17, 19-25, 27-31, 33-38, 40-41, 43-51, 53-55 and 57-66 stand rejected under 35 USC § 103(a) as allegedly being unpatentable over Belfiore et al. (U.S. Patent Publication US 2002/0059425 A1 "Belfiore") in view of Gross et al. (U.S. Patent 5,555,346) and further in view of Gruen et al., (U.S. Patent Publication US 2005/0057584 A1 "Gruen"). Applicants respectfully traverse this rejection as applied to the amended claims.

Amended independent claim 1 now recites:

A method comprising:

> determining an occurrence of a condition indicating at least one transfer of an email message by an email application, wherein determining the occurrence of the condition is external to the email application;

> identifying event data associated with the email message;

> compiling an email event from at least some of the event data;

> determining based at least in part on the event data that the email event is related to a first conversation comprising a first thread of related email messages;

> analyzing a time gap between the email event and the email messages in the first conversation;

> responsive to the time gap being less than a certain amount of time:

>> associating the email event with the first conversation; and

>> storing the email event, the association with the first conversation, and the email message; and

> responsive to the time gap exceeding the certain amount of time:

>> associating the email event with a new conversation; and

storing the email event, the association with the new conversation, and the email message.

Independent claims 25, 49, and 53 recite similar features. An advantage of the claimed invention is that, although an email event may be related to a first conversation comprising a first thread of related email message, the email event may be associated with a new conversation if a sufficiently large time gap exists between the email event and the email messages in the first conversation. Support for the amended claims is found throughout the specification, including at paragraphs 51-53.

Belfiore, Gross, and Gruen, alone or in combination, fail to teach or suggest "analyzing a time gap between the email event and the email messages in the first conversation" and "responsive to the time gap exceeding the certain amount of time…associating the email event with a new conversation." The Examiner has previously acknowledged that both Belfiore and Gross fail to disclose these claimed features. *See* Office Action dated 12/23/2008, page 18.

Gruen fails to remedy the above described deficiencies of Belfiore and Gross. Gruen describes processing an email to form an associated conversation thread tree. *See* Gruen, [0048]. The conversation thread tree is comprised of an original (*parent*) email and emails identified as replies (*children*) to the original email. *See* Gruen, [0048]-[0049]. However, Gruen does not consider a time gap between an email and previous emails when assigning the email to a conversation. Hence, Gruen fails to teach or suggest at least the claimed feature of, responsive to a time gap between an email event and email messages in a relevant conversation exceeding a certain amount of time, associating the email event with a new conversation rather than the relevant conversation.

In the rejection of presently canceled claims 60 and 64, the Examiner pointed to Gruen's statement that "event data includes start and end times of email conversations" as expressly disclosing "analyzing a time gap between the email event and the related email messages in the first conversation" and "responsive to the time gap exceeding a certain amount of time, associating the email event with a new conversation." *See* Office Action dated 12/23/2008, page 18. Applicants respectfully disagree. This statement of Gruen merely discloses that Gruen stores a time for a first email of a conversation and a time for a final email of the conversation. The mere fact that a system stores a time for an email provides no suggestion that the system processes the email based on the stored time, much less that the system associates the email with a conversation based on the stored time. Furthermore, although Gruen describes associating the email with a time or time period, Gruen is referring to an absolute time or period such as a particular time of day or month. *See* Gruen, [0013] and [0076]. Gruen does not calculate a relative time between an email and an email conversation. Accordingly, Gruen does not teach or suggest at least the claimed features of "analyzing a time gap between the email event and the email messages in the first conversation" and "associating the email event with a new conversation" in response to "the time gap exceeding the certain amount of time."

Applicants respectfully submit that Belfiore, Gross, and Gruen, alone or in any combination, fail to disclose or suggest at least "analyzing a time gap between the email event and the email messages in the first conversation" and "responsive to the time gap exceeding the certain amount of time... associating the email event with a new conversation." Accordingly, a person of ordinary skill in the art would not find the claimed invention obvious in view of the cited references.

Hence, Applicants respectfully submit that independent claims 1, 25, 49, and 53 are patentably distinguishable over any combination of Belfiore, Gross, and Gruen. In addition to reciting other patentable features such as "associating the email event with a second conversation related to the first conversation, the second conversation comprising a second thread of related email messages that is absent the email event," dependent claims 3-7, 9-17, 19-24, 27-31, 33-41, 43-48, 50-51, 54-55, 57-59, 61-63, and 65-66 incorporate the elements of their respective base claims and are patentably distinguishable for at least the same reasons.

Dependent claims 15 and 39 stand rejected under 35 USC § 103(a) as allegedly being unpatentable over Belfiore in view of Dumais et al. (U.S. Patent Publication US 2004/0267700 "Dumais"). Dumais does not remedy the above-described deficiencies of Belfiore, Gruen, and Gross, nor does the Examiner assert that it does. Dumais merely describes an information retrieval system and is cited only as allegedly showing determining if a packet received from a network comprises an email protocol. Dumais does not disclose or suggest at least the claimed features "analyzing a time gap between the email event and the email messages in the first conversation" and "associating the email event with a new conversation" in response to "the time gap exceeding the certain amount of time." Hence, Applicants respectfully submit that dependent claims 15 and 39 are also patentable over any combination of the cited references for at least the same reasons as their base claims

In sum, Applicants respectfully submit that the pending claims are not taught or suggested by the art of record, and request that the current rejections be withdrawn and the application allowed. The Examiner is invited to contact the undersigned by telephone to advance the prosecution of this application.

Respectfully Submitted,
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